REMARKS/ARGUMENTS

The Applicant has cancelled claims 2 and 11, introduced new dependent claims 18 and 19 and amended independent claims 1, 10 and dependant claims 3, 4, 12 and 13. These amendments have been made to better define the claims of the present invention, to clarify the distinction between the present invention and the cited prior art references and to make minor corrections of a clerical nature.

Claims 1 to 17 rejected under 35 U.S.C. §102(b) in view of Alleva et al.

The Examiner has rejected claims 1 to 17 under 35 U.S.C. §102(b) as being anticipated by Alleva et al. (U.S. Patent No. 5,970,449). Specifically, the Examiner has indicated that Alleva et al. teaches a configurable formatting system and method for generating a desired representation of an expression within a word list.

The Applicant respectfully submits that the present claims as amended, are not anticipated by Alleva et al.

Independent claims 1 and 10 define a system or method, respectively that includes a working list module for reading a word from the word list, identifying the contextual state and determining whether a word is associated with the expression (claims 1, 3-6, 10, 12-15, 18 and 19). In essence, the determination of whether a word is to be translated depends, in part, on the contextual state of the working list module at the time a word is read from the word list (see page 11, line 22 – page 12, line 24 of the Applicant's detailed description). Accordingly, the working list module is capable of dynamically determining that a word should be formatted in one contextual state but not in another one.

Consider, for example, a translation rule for formatting the word "centimeter" to "cm" in the dictionary database under the category WordInNumberPluralTerminator (see page 22, Table D in Applicant's detailed description). This translation rule dictates that if the

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working list module is in the WordInNumber contextual state and the next word read from the word list is "centimeter" or "centimeters", then the said word "centimeter" or "centimeters" is to be translated to "cm". Suppose that working list module can only transition from the NoCheck contextual state to the WordInNumber contextual state once it reads a word that falls within a NoCheck context match type category and the translation is an integer number (e.g. "twenty") (see FIG. 4B in Applicant's drawings). In this configuration, the working list module would determine that the word "centimeters" in the word list "count centimeters" is not to be formatted, ultimately generating the formatted word list "count centimeters". However, the same working list module would determine that the word "centimeters" in the word list "twenty centimeters" is to be formatted to "cm", ultimately generating the formatted word list "20 cm". Clearly, having a working list module that is context-sensitive is integral to the dynamic translation capabilities of the present invention.

In contrast, Alleva et al. neither discloses nor suggests reading a word from the word list, identifying the contextual state and determining whether a word is associated with the expression. To the contrary, Alleva et al. explicitly states that its normalizer applies context-free grammar to perform text normalization or translation (Alleva et al., column 2, lines 59-60). Accordingly, the system and method disclosed and suggested in Alleva et al. translates a word regardless of context. In the example previously described, Alleva et al. would translate the word "centimeters" in the word lists "count centimeters" and "twenty centimeters" equally and without any regard to context to ultimately generate formatted words lists "count cm" and "20 cm", respectively. The Applicant respectfully submits that the lack of a context-sensitive translation mechanism is a key distinction between the system and method disclosed or suggested in the Alleva et al. reference and the present invention.

Moreover, claims 1 and 10 include a category structure that is distinct from the category structure disclosed or suggested by Alleva et al. The category structure disclosed or suggested by Alleva et al. merely provides a means for organizing and indexing word translation rules (see Alleva et al., FIGS. 4, 5 and 7). In contrast, a category structure in

the present invention plays a more integral function in the dynamic and efficient translation of words associated with an expression (claims 1, 7-9, 10, 15-17). Specifically, since a category structure is defined by a selective combination of a context match type and attributes, translation rules contained within a given category are context-sensitive and words contained within a given category may share certain common properties that may be readily identified by the claimed invention for efficient word processing (see page 20, line 1 – page 23, line 12 in Applicant's detailed description and FIG 4A in Applicant's drawings). Consequently, a category structure not only works to help a working list module determine whether a word should be translated in view of its contextual state, but also efficiently provides a formatting module with valuable information on how words contained within a category are to be translated or processed.

Further, the Applicant respectfully submits that dependent claims 3, 4, 12, 13, 18 and 19 are directed to a particular structure of a working list module in a specific embodiment of the Applicant's system and method. A working list module is adapted to be either in a NoCheck state or in a WordInNumber state according to the following transition conditions: when working list is empty, working list module is in a NoCheck state; working list module enters into a WordInNumber state when the word being read is associated with the expression; and working list module returns to the NoCheck state when the word being read is associated with the termination of the expression. A working list module is further adapted to determine whether a word is associated with the expression, by: determining whether the working list module is in the WordInNumber state; determining whether the working list module is in the NoCheck state and the word is a numeral; and if either of these two conditions are true then determining that the word is associated with the expression. A working list module is further adapted to determine whether the working list module is in the WordInNumber state or NoCheck state by utilizing a context indicia, where said context indicia tracks the contextual state of the working list module.

From the above discussion, it is clear that Alleva et al. neither discloses nor suggests this particular structure of a working list module – for identifying contextual state and determining whether a word is associated with the expression.

For the foregoing reasons, the Applicant respectfully submits that the subject matter claimed in independent claims 1 and 10, as amended, is not anticipated by Alleva et al. It is further respectfully submitted that for the foregoing reasons, the subject matter of claims 2 to 9 and 11 to 17, which depend from either claim 1 or claim 10, directly or otherwise, are also not anticipated by Alleva et al.

References Made of Record and Not Relied Upon

The Applicant has briefly reviewed the other references cited by the Examiner. The Applicant respectfully submits that these references do not disclose or suggest the present invention. The Applicant respectfully submits that they are not relevant to the patentability of the claims of the present invention.

In view of the foregoing, the Applicant respectfully submits that the application is now in condition for allowance. Allowance of the application is respectfully requested. If the Examiner believes that a telephone interview would expedite allowance of the application, the Examiner is respectfully requested to contact the undersigned at (416) 957-1680.

Respectfully submitted,

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